

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO. 22-CIV-61477 SINGHAL/VALLE

DEVIN GRANDIS, AN INDIVIDUAL AND
ADVANCED POWER TECHNOLOGIES,
LLC, A FLORIDA LIMITED LIABILITY
COMPANY,

Plaintiffs,

v.

BGIS GLOBAL INTEGRATED SOLUTIONS
US, LLC, A WASHINGTON STATE
CORPORATION, AND BIFM JERSEY
TOPCO LIMITED, A JERSEY LIMITED
COMPANY,

Defendants.

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**JOINT MOTION TO EXTEND DEADLINE TO AMEND PLEADINGS
AND JOIN ADDITIONAL PARTIES**

Comes Now, Plaintiffs, Devin Grandis (“Grandis”), and Advance Power Technologies, LLC (“APT”) (collectively, the “Plaintiffs”) and BGIS Global Integrated Solutions US, LLC (“BGIS” or “Defendant”) (collectively with Plaintiffs, the “Parties”), by and through their respective counsel and pursuant to Rule 6 of the Federal Rules of Civil Procedure, hereby jointly stipulate and agree as follows:

1. On or about January 19, 2023, the Court entered an Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge (the “Order”) [DE 42].

2. The Order provided, in pertinent part, for the imposition of certain filing deadlines in this matter including, but not limited to, the selection of a mediator, amendment of the pleadings and joinder of additional parties. *See* DE 42.

3. The Parties believe they have reached an agreement that will result in dismissal of this lawsuit but need time to finalize the agreement.

4. As such, to enable the Parties sufficient time to finalize and execute a written settlement agreement, and to avoid the cost and expense of filing any amended pleadings, the Parties jointly move this Court to for a fourteen (14) day extension of time from March 2, 2023 to March 16, 2023 within which to file any amended pleadings and join additional parties.

5. This is the Parties' first request for an extension of time relating to the Order.

6. No Party will be unfairly prejudiced by the granting of the relief sought herein.

WHEREFORE, Plaintiffs, Devin Grandis and Advance Power Technologies, LLC and BGIS Global Integrated Solutions US, LLC, by and through their respective counsel, hereby request that this Court extend the March 2, 2023 deadline for parties to file amended pleadings and join additional parties to March 16, 2023.

Dated: February 28, 2023

Respectfully submitted,

s/Kenneth J. Joyce

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